

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CONSERVATION LAW FOUNDATION, INC.,
Plaintiff,

v.

TWIN RIVERS TECHNOLOGIES HOLDINGS, INC. and
TWIN RIVERS TECHNOLOGIES MANUFACTURING
CORPORATION,
Defendants.

No. 1:23-cv-11858-MPK

JOINT MOTION FOR ENTRY OF CONSENT DECREE

Plaintiff Conservation Law Foundation, Inc. (“CLF”), and Defendants Twin Rivers Technologies Holdings, Inc. and Twin Rivers Technologies Manufacturing Corporation (“Defendants”), hereby respectfully request that the Court enter the Parties’ agreed-upon Consent Decree, attached hereto as Exhibit 1. On March 17, 2025, the Parties jointly provided notice to the Court that the 45-day statutory review period for the Department of Justice (“DOJ”) ended on March 17, 2025. (ECF 21). After the DOJ requested the Parties revise the Consent Decree, the Parties attached the revised Consent Decree (ECF 21-1) to the Joint Notice and a letter from the DOJ indicating the lack of objection to the revised Consent Decree. (ECF 21-2). The Parties accordingly respectfully request that the Court enter the revised Consent Decree as attached hereto.

Date: April 30, 2025

CONSERVATION LAW FOUNDATION,
INC.,

By Its Attorneys,

/s/ Heather Govern

Heather A. Govern, Esq. (#688482)

Clare Soria, Esq. (#711648)

Conservation Law Foundation, Inc.

62 Summer St.

Boston, MA 02110

(617) 850-1765

hgovern@clf.org

Respectfully submitted,

TWIN RIVERS TECHNOLOGIES
HOLDINGS, INC. and TWIN RIVERS
TECHNOLOGIES MANUFACTURING
CORPORATION

By Their Attorneys,

/s/ Ronaldo Rauseo-Ricupero

Stephen M. LaRose (# 654507)

Ronaldo Rauseo-Ricupero (# 670014)

Donald D. Cooper (# 098330)

NIXON PEABODY LLP

Exchange Place

53 State Street

Boston, MA 02109

Telephone: (617) 345-1000

dcooper@nixonpeabody.com

slarose@nixonpeabody.com

rraiseoricupero@nixonpeabody.com

CERTIFICATE OF SERVICE

I hereby certify that on April 30, 2025, the foregoing document was filed through the ECF system, by which means a copy of the filing will be sent electronically to all parties registered with the ECF system.

/s/ Heather Govern
Heather A. Govern